

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Twana Ahmed,

Plaintiff,

V.

Universal Protection Service, LP,
d/b/a Allied Universal Security
Services

Defendant.

CIVIL ACTION NO. 4:23-cv-02823

Jury Trial Demanded

PLAINTIFF TWANA AHMED'S OBJECTIONS CONCERNING DEFENDANT'S EXHIBIT LIST

1. authenticity

Under the Court's Procedures § 12B, the parties are to put each other on notice of any objections to authenticity. Based on information known to date, Twana Ahmed objects to the authenticity of the following exhibits.

- Because defendant apparently forged a signature on AUS 1055, Mr. Ahmed has legitimate concerns about, and so objects to the authenticity of defense [exhibits 1, 3, 4, 5, 23, 25, 27, 31, 32, 34, 35, 51-55, 65, 66, 81, 82, 83, 89](#).
- Defense [exhibit 6](#) is not what defendant purports it to be. Bates numbered documents AUS 938-989 contain multiple documents rather than a single acknowledgment form.
- Defense [exhibits 18-20](#) are not what defendant purports them to be—namely proof of any training administered or delivery of an item to Mr. Ahmed. As a result, Mr. Ahmed has legitimate concerns about, and so objects to its authenticity.
- Defense [exhibit 22](#) is not what defendant purports it to be. Bates numbered documents AUS 448-449 appear to be pages from Defendant's employee manual.
- Defense [exhibit 64](#) is not what defendant purports it to be. Bates numbered document AhmedAllied 1804 does not exist.
- Defense [exhibit 68](#) refers to videos that defendant has not produced. As a result, and because defendant apparently forged a signature on AUS 1055, Mr. Ahmed has legitimate concerns about, and so objects to its authenticity.
- Defense [exhibit 73](#) is not what defendant purports it to be. Bates numbered document AUS 495-497 is a communication from Mr. Ahmed's counsel, not a letter written by Mr. Ahmed.
- Defendant has not produced [exhibit 85](#). As a result, and because defendant apparently forged a signature on AUS 1055, Mr. Ahmed has legitimate concerns about, and so objects to its authenticity.

Agreement to authenticity of any other exhibit does not mean agreement to accuracy on the facts within those exhibits.

2. objections beyond authenticity — request for approval of parties' agreed, proposed modification

The parties jointly proposed the following modification to objections to pretrial exhibits in the joint pretrial order [ECF Doc. 45, p. 9 at ¶ 10]:

The parties request Court approval of an agreement that modifies Court procedure on exhibit objections. The parties agree that they may, but are not required to, object to exhibits before trial, except for authentication objections. Authentication objections will follow the Court's procedures — i.e., notifying “offering counsel in writing within 7 days after the exhibit is listed and made available to opposing parties. Failure to do so may be deemed an admission of authenticity.” The parties believe other exhibit objections are better made in the context of trial and tend to be fewer or more limited in that context. The parties believe use-it-or-lose-it objections to exhibits before trial [and without the context of trial] may lead parties to feel compelled to assert all possible objections, not knowing the trial evidence or context at this time.

Twana Ahmed requests approval of the proposed modification for the reasons stated.

If the Court does not approve the jointly requested modification, Mr. Ahmed requests a reasonable amount of time to assert any possible objections.

Respectfully submitted,

/s/Amanda C. Hernandez

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 9, 2025, *Plaintiff Twana Ahmed's Objections Concerning Defendant's Exhibit List* was filed via the Court's CM/ECF system, thereby automatically serving Defendant's attorneys of record.

/s/Amanda C. Hernandez
Amanda C. Hernandez